

From: [Nhan, Chuong \(CM\)](#)
To: [Schofield, John](#)
Cc: [Thomas, David](#); [Bedoya, Hector](#)
Subject: FW: Follow-up to EPA's August 17, 2021 Compliance Evaluation Inspection
Date: Thursday, September 2, 2021 1:19:40 PM
Attachments: [ATT00001.txt](#)
[ATT00002.txt](#)

Hi John,

The following is the response to your information request.

- LDAR reports for Subpart BB components for 2020 and 2021 and inventory are attached. We have performed inventory maintenance in some of these areas in 2020 and 2021 so that is the reason some components are added throughout the quarters and others removed.
- Our consultant, Montrose Environmental, indicated that there are no unsafe to monitor Subpart BB components currently on our LDAR list, so we don't have Unsafe to Monitor Plan currently. Also note that we have some inaccessible Subpart BB components that are only inspected Q3 annually and therefore no data is seen for these same components in the rest of the quarters.
- The AmSty polystyrene production process includes a condenser system which contains both a partial condenser and a final condenser. Vessels T469/T569 are part of and integral to the operation of the partial condenser system to ensure adequate vacuum is maintained within the process. While in operation, the partial condenser continuously removes high boiling point materials which are collected in vessels T469/T569. Since vessels T469/T569 operate on level control to ensure sufficient vacuum is maintained, material from these vessels is periodically pumped out to storage tank T307 throughout a normal operating day. AmSty considers vessels T469/T569 to be part of the manufacturing process unit as it is integral to the polystyrene production process therefore these vessels are exempt from RCRA regulation under 261.4(c). Waste is generated when the condensed liquids are removed from vessels T469/T569 and pumped to storage tank T307. There is no recovery of material once material reaches storage tanks T307 and T599.
- Concerning the repair tags, RV-003302 and RV-000523 (identified as 10603 or 10608 in your email), these are information tags only for us to know where the RV came from, who remove it, was it washed or not, the SAP work order #. These tags also helps us to know location of where they go when they return and mostly used when we remove the RV. If they are exposed to the sun for extended periods of time they will fade. Repair and maintenance records for these 2 RV tags are attached for your review. RV-3302 is on 3-year repair service schedule and RV-0523 is on an annual service. During the service, we remove them and send out for inspection and repair and install new RV's from the shelf in their places.

Please let us know if you need additional information.

Best Regards,

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From: Schofield, John <Schofield.John@epa.gov>
Sent: Friday, August 20, 2021 2:13 PM
To: Nhan, Chuong (CM) <chuongNHAN@amsty.com>
Cc: raquel.doom@fire.lacounty.gov
Subject: [EXT] Follow-up to EPA's August 17, 2021 Compliance Evaluation Inspection

Chuong,

It was a pleasure meeting you, Hector and talking with David (via phone). As promised, I am providing a follow-up e-mail to the inspection requesting the following information/documentation:

- Please provide Leak Detection and Repair (LDAR) reports prepared by AmSty's consultant in 2020 and 2021 to date.
- Please provide a list of Unsafe to Monitor equipment that has been identified by AmSty and/or its consultants (see 22 CCR 66265.1057(f)(1)) in effect at the time of the inspection.
- Please provide Unsafe to Monitor Plan (22 CCR 66265.1057(f)(2)) in effect at the time of the inspection.
- Please provide a complete list of equipment covered under the facility's LDAR program.
- Please confirm my understanding the tanks T-469 and T-569 receive materials from the partial condensers. From these tanks the waste materials are transferred to hazardous waste accumulation tanks T-307 and/or T-559. Additionally, what is the average length of time materials are held in Tanks T-469 and T-569 before being transferred to the hazardous waste accumulation tanks? Finally, please confirm that none of materials collected in T-307 and/or T-559 are recycled or reclaimed.
- There were repair tags for PV-3302 and for either monitoring point 10603 or 10608. The repair tag for PV-3302 was not legible. The date of the other tag was 4-1-2020. Please provide inspection and repair records related to these two items identified for repair.

Thank you for your help in completing this inspection.

regards,

John

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